

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

IN RE:	§	CHAPTER 11
	§	
FRANCHISE GROUP, INC.	§	
	§	CASE NO. 24-12480
DEBTOR	§	

**NOTICE OF WITHDRAWAL OF PROOF OF CLAIM NO. 151**

NOW COMES the City of El Paso and files this Notice of Withdrawal of Proof of Claim No. 151 in American Freight, LLC, Case No. 24-12527. In support thereof, the City of El Paso respectfully represents the following:

1. The City of El Paso filed its secured proof of claim herein on November 19, 2024 in the amount of \$8,315.09, which claim is designated as claim number 151 with the claims' agent.
2. The tax debt to subject to the City of El Paso's proof of claim is paid in full.
3. The City of El Paso desires to withdraw its proof of claim no. 151 filed herein based upon the reasons stated above.

Respectfully submitted,

**LINEBARGER GOGGAN  
BLAIR & SAMPSON, LLP**  
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By: /s/ Don Stecker  
David G. Aelvoet (SBN 00786959)  
Don Stecker (SBN 19095300)

Attorney for the City of El Paso

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Notice of Withdrawal of the City of El Paso Proof of Claim No. 151 was served this 14th day of January, 2025 by Electronic Mail and/or by First Class Mail upon the following:

Debtor:

American Freight, LLC  
109 Innovation Court  
Suite J  
Delaware, OH 43015

Attorney for Debtor:

Shella Borovinskaya  
Young Conaway Stargatt & Taylor, LLP  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801

U.S. Trustee:

Office of the United States Trustee  
J. Caleb Boggs Federal Building  
844 King Street, Suite 2207  
Lockbox 35  
Wilmington, DE 19801

/s/ Don Stecker  
Don Stecker